
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DELAWARE VALLEY AESTHETICS, PLLC	:	
D/B/A RUMER COSMETIC SURGERY	:	
and	:	NO. 20-cv-00456
KATHY RUMER, DO FACOS	:	
	:	
v.	:	
	:	
JOHN DOE 1	:	
and	:	
JANE DOE 1	:	

STATUS REPORT

Plaintiffs, by and through their undersigned counsel, submit the following status report as required by the Court's Order of May 21, 2020. Plaintiffs have taken the following actions to identify the Defendants and their respective citizenship:

1. On February 20, 2020, Plaintiffs issued subpoena to Google to determine identity of individual registered to the Gmail account rumersanonymous@gmail.com. Google responded it did not have any identifying information regarding the individual registered to the requested Gmail account.
2. On March 11, 2020, Plaintiffs issued a subpoena to attend and testify to Katelyn Burns, a reporter who contacted Plaintiffs regarding an article she was researching. Ms. Burns had spoken to several of Plaintiffs' past patients. Plaintiffs scheduled Ms. Burns' deposition for April 2, 2020. However, due to COVID-19 restrictions, Ms. Burns' deposition was adjourned and has yet to be rescheduled.
3. On March 27, 2020, Plaintiffs issued a subpoena to CloudFlare, the internet service provider associated with the I.P. address for rumersanonymous.blogspot.com. Plaintiffs did not receive a response to this subpoena.
4. On April 29, 2020, Plaintiffs sent correspondence to CloudFlare requesting a response to their subpoena. CloudFlare failed and/or refused to respond to said correspondence.
5. On May 18, 2020, counsel visited CloudFlare's website and discovered that due to the pandemic, all CloudFlare employees were working remotely. Therefore, CloudFlare's mail was not being monitored. Counsel for Plaintiff located an email for CloudFlare's general counsel, Douglas Kramer, Esq., and forwarded him a copy of the subpoena.

6. On May 21, 2020, CloudFlare's general counsel responded to Plaintiffs' counsel's email requesting additional information in order to comply with the subpoena.
7. As of the date this Status Report was filed, counsel is still awaiting a response to its March 27, 2020 subpoena. Based on counsel's communications with CloudFlare's general counsel, a response is expected in the near future.
8. Upon information and belief, with CloudFlare's response to Plaintiffs' March 27, 2020 subpoena, in combination with the information that will be obtained from the deposition of Katelyn Burns (which will be rescheduled in the near future), Plaintiffs will discover the identity of John/Jane Doe and be able to move forward with the instant litigation.

ROGERS CASTOR

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